IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MIKE SHALES, *et al*.,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
v.	)	NO. 11 C 1217
	)	
DIENST SEWER & WATER, INC.,	)	JUDGE MATTHEW F. KENNELLY
an Illinois corporation,	)	
	)	
Defendant.	)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, DIENST SEWER & WATER, INC., an Illinois corporation, in the total amount of $40,446.18, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of $4,619.25.

On May 2, 2011, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to the Illinois Secretary of State because the corporation's registered agent could not, with reasonable diligence, be found at the registered office of record in Illinois. Therefore, Defendant's answer was due on May 23, 2011. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/   Catherine M. Chapman

<u>**CERTIFICATE OF SERVICE**</u>

   The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this <u>2nd</u> day of <u>August 2011</u>:

       Mr. Dale L. Goldsboro, Registered Agent/President
       Dienst Sewer & Water
       2252 N. 44th Road
       Sheridan, IL 60551

       Jesse White
       Secretary of State
       Department of Business Services
       Attn: File #6076-5325
       Springfield, IL 62756

        /s/ Catherine M. Chapman

Catherine M. Chapman
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